

PROPOSAL EVALUATION

Integrated Regional Water Management Implementation Proposition 50, Chapter 8 IRWM Implementation Step 1

PIN: 7246
APPLICANT NAME: Pleasant Valley Water District
PROJECT TITLE: Pleasant Valley Groundwater Banking Project

FUNDS REQUESTED: \$14,495,310
COST MATCH: \$ 1,610,590
TOTAL PROJECT COST: \$16,105,900

DESCRIPTION: Project in the Arroyo Pasajero Watershed (APW) for the benefit of US Fish & Wildlife Service, Dept of Fish & Game, City of Coalinga, Westside RCD, Fresno Co, I-5 Business Development Corridor, PVWD, Westlands WD, and various banking partners. The centerpiece of the APW IRWM Plan is a multifaceted project incorporating interrelated beneficiaries and integrated Water Mgmt Strategies including water supply reliability, habitat protection and improvement, water quality, groundwater management, and storm water capture. The ensemble of proposed banking facilities consist of a 200-acre complex of infiltration basins, a new extraction well for removal of water from the aquifer, booster pump stations to move water around the basin complex and lifting water to a new conveyance structure, namely, a proposed 4.5 mile length of pipeline and canal connecting the infiltration basins to the distribution system.

Question: Consistency with Minimum IRWM Standards - This evaluation will focus on whether the applicant has demonstrated that the IRWM Plan meets the minimum standards.

Pass

Question: Consistency with IRWM Standards - Adopted IRWM Plan and Proof of Formal Adoption. Weighting factor is 1. 2

The applicant's IRWMP for the Arroyo Pasajero watershed is yet adopted. Adoption is scheduled for December 2005.

Question: Consistency with IRWM Standards - Description of Region. Weighting factor is 1. 2

Only maps showing the proposed groundwater bank location or the applicant's district were provided. The boundaries of the Arroyo Pasajero watershed were not shown. The only argument for the appropriateness of this region as an area for water management was its location. A brief and general description of the region's water resources was provided, as well as brief descriptions of ecological processes and environmental resources. Social and cultural descriptions were provided, but only in very brief detail. Overall, no clear picture of the region was presented and the justification for the region was not very convincing. This region overlaps with the region identified by another applicant (PIN 4676, San Luis & Delta Mendota Water Agency (SLDMWA)). No regional cooperation with that applicant could be found in the application.

Question: Consistency with IRWM Standards - Objectives. Weighting factor is 1. 3

The applicant states the objectives of the IRWMP have a distinct history relating to water supply and reliability and were determined through many years of planning with stakeholders. Overall, the objectives are very broad, overlap, and are focused solely on the Groundwater Banking Project (GWBP), the single project contained in the IRWMP. 16 objectives are presented which were identified through a questionnaire, but no copies of the questionnaire responses were provided. There is no explanation of how these objectives relate to conflicts in the region.

Question: Consistency with IRWM Standards - Water Management Strategies and Integration. Weighting factor is 1. 3

The applicant does describe the primary water management strategies considered in the IRWMP and presents valid arguments as to their integration. Most of the strategies address the identified objectives; however, no clear picture is provided as to how each strategy would directly relate to a specific objective. Strategies that were not considered were not discussed. In general, the applicant does consider the integration of various water management strategies and does acknowledge the benefit that integration provides, but little technical support is included. The description for the added benefits of integrating multiple strategies did not include a clear message as to how the integration has added benefits.

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Question: Consistency with IRWM Standards - Priorities and Schedule. Weighting factor is 1.

2

Because the GWBP is the only project discussed in the IRWMP, it is by default the only priority. It is difficult to determine whether this one project benefits the entire region, or only benefits the applicant's service area. For the GWBP, short-term priorities are planning, and long-term priorities are operation. Again, because the GWBP is the only project, reorganization of the project due to regional changes and project re-sequencing are not expected to occur. There is discussion of a monitoring and evaluation method and feedback loop to address responses to the implementation project, but not how it will be completed. No schedule for implementation of the GWBP is provided in the IRWMP.

Question: Consistency with IRWM Standards - Implementation. Weighting factor is 1.

2

There is only one project contained in the IRWMP, but the IRWMP mentions many other objectives that still need to be met. Linkages or interdependence between projects are not identified since this IRWMP contains only 1 project. The studies for this project are complete, but a water supply for the banking project has not been identified or secured. The economic and technical feasibility of the project is described in the Groundwater Storage Pilot Project and Feasibility Study. The institutional structure that will ensure IRWMP implementation is described as the responsibility of the applicant. The current status of each element of the IRWMP is missing. It appears that the IRWMP did not assess options or discuss alternative projects and only focused on one project. The applicant could have been much more specific regarding implementation phases, since so much technical analysis has already been prepared.

Question: Consistency with IRWM Standards - Impacts and Regional Benefits. Weighting factor is 1.

2

The applicant does a good job of stating potential negative impacts, but environmental review appears that support the no impacts statement for groundwater quality or quantity were not apparent. Regional benefits associated with the GWBP are stated. However, the IRWMP does not seem to be "regional." It instead appears to be a local effort spearheaded by the applicant and a lack of regional cooperation seems apparent. The GWBP is included in a larger, more comprehensive, IRWMP (PIN 4676), but is not included in the funding proposal. A general discussion regarding environmental justice concerns is presented, but no direct comparison of the project's benefit to DACs. Overall, some impacts are presented, but the overall benefits of this single project to the region are not defined.

Question: Consistency with IRWM Standards - Technical Analysis and Plan Performance. Weighting factor is 1.

3

The IRWMP has a discussion of the data, technical methods, and analyses used in the selection of the project or project planning. Monitoring methods are discussed and detailed groundwater quality sampling procedures are attached. No discussion is included on how this data will be used or integrated into project operation and to select water management strategies. For a project that has been studied and considered for so long, it seems as though very detailed performance standards should be in place to measure effectiveness.

Question: Consistency with IRWM Standards - Data Management. Weighting factor is 1.

3

The applicant states that data will be disseminated to stakeholders and the public through various meetings and press releases, but no specific mechanisms are provided that will allow for easy access of complete data. Data collection will be done through a modified version of the DWR data management system, which the applicant received funding for through a DWR grant. Groundwater quality and quantity is, and will be, monitored and incorporated into the database, and the IRWMP will manage data consistent with GAMA. More information should be provided as to the methods of sharing the information with other agencies not part of the applicant's proposal and how this supports statewide data needs.

Question: Consistency with IRWM Standards - Financing. Weighting factor is 1.

3

The City of Coalinga has pledged to pay for half of the 10% cost share, and a landowner has pledged to transfer private land to the applicant. The remaining portion of the cost share will be paid through user fees included in the price of water allocated by the GWBP. Beneficiaries and funding for implementation is briefly discussed, but information as to how the listed agencies will benefit is not included. Ongoing support and management is discussed, but not how this will happen. Ongoing support and financing for O&M was not apparent. Obstacles for implementation should have included how surface water supplies would be obtained.

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Question: Consistency with IRWM Standards - Relation to Local Planning & Sustainability. Weighting factor is 1.

3

The applicant has linked the preparation of the IRWMP with several other local planning documents, such as their GWMP and Groundwater Extraction Policy, as well as Fresno Co. General Plan policies. The planning dynamics are not presented, and there is no indication of what documents take priority. The applicant indicates that the IRWMP was prepared with input from all stakeholders and land-use decision makers of the region. The applicant states this bottom-up approach of watershed management will be used as a model for other regions. The applicant does not discuss the other IRWMP (PIN 4676) that the applicant has participated in or how one IRWMP might add to or conflict with the other IRWMP. Also, the applicant did not address any cooperation with DWR, which has a significant role in managing flood basins and flood easements in the Arroyo Pasajero watershed, which would be necessary for this project from a water supply perspective.

Question: Consistency with IRWM Standards - Stakeholder Involvement & Coordination. Weighting factor is 1.

3

The applicant provides examples of how they incorporated various stakeholders within the region in the development of the IRWMP and how those stakeholders came to consensus on the goals and objectives of the IRWMP. Numerous letters of support were provided from businesses within the region. Documented outreach methods were presented with various groups and agencies. The applicant downplays their involvement with the SLDMWA and the fact that their GWBP is also included in that adopted IRWMP. There was no indication regarding the inclusion of that group within the decision making process. DACs are discussed. No obvious discussion of environmental justice concerns was provided.

Question: Funding Match. This evaluation will focus on whether the applicant has demonstrated the ability to meet the minimum funding match or has requested a waiver or reduction in the funding match.

Pass

Question: Description of Proposal. Weighting factor is 3.

6

The proposal is lacking in many aspects, and fails to discuss most of the evaluation criteria for this section. In Attachments 7 and 8 the 1 project is broken down by project phases, and elsewhere in the submittals a figure is provided showing the project's boundaries, but no detail is provided in Attachment 6. Little information is provided about the project's relation to the IRWMP, though as it is the only project in the IRWMP and is the dominant theme of the IRWMP. There is no relation to water management elements, NPS control methods, or defined metrics. Most of the proposal description highlighted the grants that have already been received. The applicant could have provided excellent detail of the project by referencing Appendices of the IRWMP or reiterating information contained in the IRWMP. It should be noted that the applicant has not secured a water supply for this groundwater banking project, making the practicality of the project seem questionable.

Question: Project Prioritization. Weighting factor is 2.

2

Some the project is the only project discussed in the IRWMP, no discussion of project prioritization was provided in the application. No breakdown of the proposal was provided, which should have indicated which components of the proposal took precedent over others. The GWBP is one of the key projects contained within the Westside Integrated Water Resources Plan, the IRWMP for PIN 4676. However, the GWMP was not included in that application because this applicant chose to submit a separate application. The reviewers of the two applications feel that a single application would have scored higher than the individual efforts.

Question: Cost Estimate. Weighting factor is 1.

3

The applicant provided a single sheet outlining costs associated with the project. The land purchase and construction tasks are supplemented by detailed estimates. Although the description of the project is general, the design and construction costs appear reasonable. A 10% funding match is provided. However, the \$2,000/AF for purchase of CVP Entitlement Purchase is not explained. For the project size of 5,000 AF this becomes a \$10,000,000 cost without sufficient explanation of how the cost was derived.

Question: Schedule. Weighting factor is 1.

4

The schedule provided by the applicant appears reasonable, breaks down the project well, and includes detailed tasks and an indication of what tasks will be ongoing after construction. Only a spreadsheet is provided, and no narrative is attached that would better explain the schedule.

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Question: Need. Weighting factor is 2.

6

The applicant does present a need for the proposal with respect to water supply reliability and water quality improvement. The applicant also provides examples of the benefits each project participant would receive, as well as examples of how the participants would help reach the goals of the proposal with their available resources. The applicant does not go into much detail regarding local or regional economic, environmental, or fiscal conditions relative the project's need. Also, an analysis of the negative impacts as a result of not completing the project was not well presented in the application.

Question: Disadvantaged Communities. Weighting factor is 2.

6

Within the region, Coalinga and Huron are the only cities, and Coalinga is not a DAC. Huron, while it is a DAC, is outside the applicant's service area. Therefore, a direct benefit from the project to a DAC is not readily apparent. Two of the four census tracts in the region are also considered DACs. The applicant states it would provide improved water supply and water quality to the DACs, which would ensure that agricultural jobs and other industries remained in the area. No information is provided as to how, from a water quality and quantity perspective, the DACs would be benefit directly from this project. Population numbers of the tracts are provided, but not as a percentage of the region. The applicant does state that the 10% funding match would be a hardship for the region, but does not provide supporting evidence.

Question: Program Preferences. Weighting factor is 1.

2

There is no direct discussion of how the proposal would meet the Program Preferences. The applicant provides only brief justifications for water supply and quality improvement. There is no discussion of safe drinking water and water quality projects for DACs, and no discussion of reduction of pollution in impaired waters and sensitive habitat areas.

TOTAL SCORE: 60
